Case 3:08-cv-02189-N Document 15 Filed 04/23/09 Page 1NORTH PROGRESS 1RACT OF TEXAS

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

APR 23 2009

RICT COURT

U.S. DISTRICT COURT

ORIGINAL

JANE DOES 1 - 3

Plaintiffs

٧.

Civil Action # 3-08-CV-2189-N

CLERK, U.S.

SUNG BUM CHANG, HYANG KYUNG CHANG, AND CLUB WA D/B/A WA ENTERTAINMENT, INC. Defendants

DEFENDANT'S ORIGINALANSWER

- 1. Defendant, Hyang Kyung Chang, was served with a copy of the Summon for this Civil Action on April 7th, 2009, at 565 West Oates Rd # 166 Garland, Tx. 75043
- 2. Defendant, denies each and every one the allegations made by the Plaintiffs. Defendant requires the identity of the Plaintiffs to specifically rebut the allegation. No valid safety concerns exist here to warrant withholding the identity of the Plaintiffs.
- 3. Furthermore, Petitioners' claims are barred by the Statute of Limitations and this Court lacks subject matter and personal jurisdiction for the claims.
- 4. Accordingly, Defendant submits that Plaintiffs are not entitled to any relief at the present time or in the future.

Respectfully Submitted,

Hyang Kyung Chang (Defendant)

565 West Oates Rd # 166 Garland, Tx. 75043

## CERTIFICATE OF SERVICE

I hereby certify that on April +7, 2009, a copy of this document was served upon Luis G. Zambrano, Fulbright & Jaworski L.L.P., 2200 Rose Avenue, Suite 2800, Dallas, Texas 75201, by depositing it at the Garland post office mailbox with first class postage attached.

Hyang Kyung Chang

SUBSCRIBED AND SWORN TO BEFORE ME on this  $\cancel{-4.7}$  day of April, 2009.

JUDY LONG
NOTARY PUBLIC
STATE OF TEXAS
MY Commission Expires
March 14, 2011

NOTARY PUBLIC, IN AND FOR

STATE OF TEXAS

My commission expires: \_\_\_\_\_





Office of the Clerk United States District Court

Northern District of Texas Dallas Division 1100 Commerce Street

Room 1452 Dallas, Texas 75242-1495 GERTIFIED MAIL.

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